

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JILL BABCOCK, MARGUERITE
MADDOX and ASHLEY JACOBSON,
on behalf of themselves and all others
similarly situated,

No. 2:22-cv-12951

HON. JONATHAN J.C. GREY

Plaintiffs,

MAG. ANTHONY P. PATTI

v

STATE OF MICHIGAN, COUNTY OF
WAYNE, CITY OF DETROIT, DETROIT-
WAYNE JOINT BUILDING
AUTHORITY,

Defendants.

CITY OF DETROIT’S FIRST AMENDED LAY WITNESS LIST

Defendant City of Detroit hereby submit their Initial Lay Witness List, pursuant to the Court’s May 29, 2024, Amended Scheduling Order. The City of Detroit states that the following witnesses may be called at trial if it appears that they have noncumulative knowledge of facts relevant to issues which may arise at trial:

1. Plaintiff Jill Babcock
2. Plaintiff Marguerite Maddox
3. Plaintiff Ashley Jacobson
4. Michael Kennedy – Detroit-Wayne Joint Building Authority
5. Greg McDuffe – Former employee of Detroit-Wayne Joint Building

Authority

6. Donnie Johnson – City of Detroit
7. Alethea Johnson – City of Detroit Human Resources Department
8. James Foster – City of Detroit (BSEED)
9. Charles Reed – City of Detroit (BSEED)
10. Christopher Samp – City of Detroit (CRIO)
11. Lashonda David – City of Detroit (CRIO)
12. Jessica Parker – City of Detroit (CRIO)
13. LaJuan Counts – City of Detroit (CRIO)
14. LaWanda Crosby – 36th District Court Administrator
15. Nicole O’Dea – 36th District Court Chief Financial Officer
16. LaDonne Banks – 36th District Court
17. Janice Hardnett – City of Detroit
18. Gina Avery-Walker – City of Detroit
19. Daniel Baxter – City of Detroit
20. Timothy Palazallo – City of Detroit (Construction and Demolition Department)
21. John Naglick, Jr. – City of Detroit (Finance Department)
22. Crystal Perkins – City of Detroit (Director of General Services)
23. Current or former employees of and agents of the State of Michigan

24. Current or former employees of and agents of the City of Detroit
25. Current or former employees of and agents of Wayne County
26. Current or former employees of and agents of the Detroit-Wayne Joint Building Authority
27. Corporate Designee of the City of Detroit
28. Defendants may also call records custodians and past and present employees of the entities identified above
29. All witnesses identified in any deposition transcripts, answers to interrogatories or discovery responses, exhibits or other documents or reports produced or exchanged throughout the course of litigation.
30. All persons referred to in any complaint filed in this lawsuit, but not specifically named.
31. All persons or entities listed on party witness lists, or any other witness list filed in this case.
32. All persons or entities listed on party initial disclosures, or any other disclosures served in this case.
33. Impeachment and/or rebuttal witnesses as necessary

As discovery is ongoing, and since Plaintiff has not provided responses to Defendants discovery requests or had an opportunity to depose Plaintiff, the City of Detroit reserve the right to designate further witnesses, including experts, after the close of discovery. If it appears that additional witnesses will or may be called to testify at trial, their names shall be reported to Plaintiff's counsel as soon as possible prior to trial. This restriction does not apply to rebuttal witnesses.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK & STONE,
P.L.C.

By: /s/Lawrence T. García
Lawrence T. García (P54890)
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Dated: January 10, 2025

PROOF OF SERVICE

The undersigned hereby certifies that on December 30, 2024, a copy of the foregoing document and this **Proof of Service** were caused to be served upon the attorneys of record of all parties to the above cause by:

<input type="checkbox"/> First-Class Mail	<input checked="" type="checkbox"/> E-File/E-Serve	<input type="checkbox"/> E-mail
<input type="checkbox"/> FedEx	<input type="checkbox"/> Hand Delivery	

I declare under the penalty of perjury that the statement above is true to the best of my information, knowledge, and belief.

By: /s/Lawrence T. García
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